

EXHIBIT 1

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

KRISTIAN FALKENSTEIN,

Plaintiff,

v.

SANTANDER BANK, N.A.,

Defendant.

CIVIL ACTION NO. 2:14-CV-5994

**RULE 68 OFFER OF JUDGMENT BY
DEFENDANT SANTANDER BANK, N.A.**

Pursuant to Rule 68 of the Federal Rules of Civil Procedure, defendant Santander Bank, N.A. ("Santander") hereby offers to allow judgment to be taken against it in this action as to all claims asserted against it by plaintiff Kristian Falkenstein ("Plaintiff"), in the amount of (a) One Thousand and One Dollars (\$1,001.00) payable to Kristian Falkenstein; and (b) all reasonable costs incurred in this action to date, including reasonable attorneys' fees, as determined by the Court, payable to the Plaintiff. This offer of judgment is made for the purposes of Rule 68 only, and neither it nor any judgment that may result from this offer may be construed either as an admission of liability on the part of Santander or that Kristian Falkenstein has suffered any damage. Any judgment entered pursuant to this offer will be in full satisfaction of all claims for damages and costs as asserted against Santander by Kristian Falkenstein in the Complaint in this action.

If this Offer of Judgment is not accepted in writing within fourteen (14) days after its service, it shall be deemed withdrawn.

Dated: February 9, 2015

REED SMITH LLP

ACCEPTED:
[Signature]
Counsel for Plaintiff
2/20/15

By:

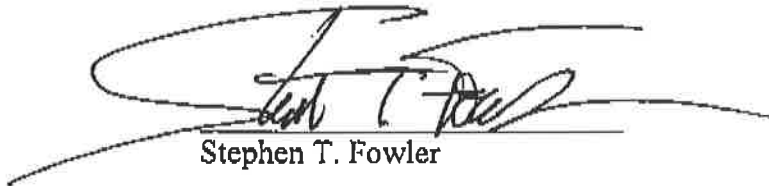
s/ Marc A Goldich
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Santander Bank, N.A.

Certificate of Service

I hereby certify that, on February 9, 2015, I caused to be served a true and correct copy of the foregoing by facsimile and U.S. mail, first-class postage prepaid, on counsel of record for the plaintiff at the following address:

Darren Harrison, Esq.
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Stephen T. Fowler